

# EXHIBIT N

**From:** [de Gramont, Alexandre](#)

**Sent:** Tuesday, July 18, 2023 9:52:38 AM

**To:** [Hayes, Michael Liu, Angela](#)

**Subject:** RE: Abubakar v. Chicago State University (2023 -L- 006854)- subpoena

**Importance:** Normal

**Sensitivity:** None

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Mike,

Are you available for a call this afternoon with Angela and me? It would be off the record, protected by the settlement privilege etc. We are wondering if there might be a way to move forward without a deposition.

We could speak at 1pm (Chicago time) or later.

I assume you have a copy of my July 10 letter to Mr. Carter, with attachments, but if not, let me know and I will forward it to you.

Thanks, Alex

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**From:** de Gramont, Alexandre

**Sent:** Monday, July 17, 2023 3:52 PM

**To:** Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)>; Liu, Angela <[Angela.Liu@dechert.com](mailto:Angela.Liu@dechert.com)>

**Subject:** RE: Abubakar v. Chicago State University (2023 -L- 006854)- subpoena

Thanks, Mike. The problem is that that might be too late for the Nigerian litigation. But we will check and get back to you, through probably not until tomorrow morning. Best, Alex

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**From:** Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)>

**Sent:** Monday, July 17, 2023 3:51 PM

**To:** de Gramont, Alexandre <[Alexandre.deGramont@dechert.com](mailto:Alexandre.deGramont@dechert.com)>; Liu, Angela <[Angela.Liu@dechert.com](mailto:Angela.Liu@dechert.com)>

**Subject:** RE: Abubakar v. Chicago State University (2023 -L- 006854)- subpoena

[EXTERNAL EMAIL]

Thank you, Alex.

Right after I proposed the week of July 31 in my below email to you, I heard back from CSU that it's designee who will testify is on vacation that week. So, the week of August 7 is the earliest we could proceed. Wanted you to know that as you confer with your client.

Regards,

Mike

**Michael Hayes**

**Partner**

Direct: 312-341-9830

[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)

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**From:** de Gramont, Alexandre <[Alexandre.deGramont@dechert.com](mailto:Alexandre.deGramont@dechert.com)>

**Sent:** Monday, July 17, 2023 2:33 PM

**To:** Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)>; Liu, Angela <[Angela.Liu@dechert.com](mailto:Angela.Liu@dechert.com)>

**Subject:** RE: Abubakar v. Chicago State University (2023 -L- 006854)- subpoena

[EXTERNAL EMAIL]

Dear Mr. Hayes:

We acknowledge receipt of your email below. We will confer with our client. We hope to revert to you shortly.

Kind regards, Alex

Alexandre de Gramont  
Partner

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**From:** Hayes, Michael <[Michael.Hayes@huschblackwell.com](mailto:Michael.Hayes@huschblackwell.com)>  
**Sent:** Monday, July 17, 2023 3:26 PM  
**To:** de Gramont, Alexandre <[Alexandre.deGramont@dechert.com](mailto:Alexandre.deGramont@dechert.com)>; Liu, Angela <[Angela.Liu@dechert.com](mailto:Angela.Liu@dechert.com)>  
**Subject:** Abubakar v. Chicago State University (2023 -L- 006854) - subpoena

**[EXTERNAL EMAIL]**

Good afternoon, Mr. de Gramont and Ms. Liu:

The undersigned represents Chicago State University ("CSU") in connection with the subpoena your firm recently served on CSU in the above referenced matter. Please direct all future communications concerning this matter to me and do not contact anyone at CSU directly.

For several reasons, the July 21, 2023 date you unilaterally selected for CSU's corporate representative's deposition is unreasonable and unworkable and the deposition cannot go forward on this date. First, CSU is required under FERPA to give notice to the former student involved so he can intervene, move to quash or move to limit the subpoena. The less than 10 day time frame you have selected is unreasonably too short for this required FERPA process. Second, and FERPA issues aside, subpoenaing a third-party to appear for deposition in less than 10 days is not reasonable. Third, neither my client nor I are available this Friday (or before) to prepare for and participate in this deposition.

Please advise if your client is amenable to rescheduling this deposition by agreement for a date in the week of July 31. If not, CSU will file an objection to the subpoena/motion for a protective order prior to this Friday.

I look forward to hearing from you on the above.

Thank you,

Mike Hayes

**Michael Hayes**  
Partner

**HUSCH BLACKWELL LLP**

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**Education**

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Thank you.